



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-3397
JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

815-223-1714

EPA Region 5 Records Ctr.



298526

February 28, 2007

Mr. Keith Wilcoxson P.G.
SECOR International Inc.
446 Eisenhower Lane North
Lombard, Illinois 60148

Refer to: 2010300074—Winnebago County
Southeast Rock Groundwater Contamination Site
Superfund/Technical Reports

Dear Mr. Wilcoxson

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the document entitled, Groundwater Management Zone Application Remedial Design Area 9/10 dated November 30, 2006. The document was prepared by SECOR on the behalf of Hamilton Sundstrand Corporation to address the requirements of the Remedial Design Source Area 9/10 pursuant to the Record of Decision (ROD) signed in June 2002. The final GMZ document shall a stand alone Report and include enough relevant information as to formerly meet the Ill. Adm. Code 620.250. Please address the comments below incorporating all of the necessary information.

1. Groundwater below the Hamilton Sundstrand facility is a Class I Groundwater in accordance with Ill. Adm. Code 620.210. Therefore, in order for compliance with the ARARs in the ROD, Hamilton Sundstrand shall establish a GMZ as part of the RD process. In order for the GMZ to be accepted, Illinois EPA will need to formerly approve the corrective action process. The corrective action process shall meet the selected remedy set forth in the ROD SCL-910E "Install Injection Wells along boundary of GMZ and Source Area/Install Air Sparging Unit/Inject Air Restriction on Groundwater Usage". In addition the unknown nature of some of the potential sources of contamination potentially located below the existing building may require adjustments to actual GMZ document in the future.

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ELGIN - 595 South State, Elgin, IL 60123 - (847) 608-3131 • PEORIA - 5415 N. University St., Peoria, IL 61614 - (309) 693-5463
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2. The document does state that, "Groundwater (leachate) will be monitored at predetermined intervals for 30 years, per the Resource Conservation and Recovery Act post closure monitoring requirements." In order for Ill. Adm. Code 620.250 to be met the following requirements in accordance with Ill. Adm. Code Part 724 will need to be specifically addressed in more detail.
 - a. Groundwater monitoring requirements pursuant to Ill. Adm. Code Part 724 Subpart F.
 - b. Closure and Post Closure requirements pursuant to Ill. Adm. Code Part 724 Subpart G and 725 were applicable.
3. Groundwater monitoring requirements pursuant to Ill. Adm. Code Part 725 Subparts F and G should also be addressed and incorporated into the GMZ were applicable.
4. Issues related to the establishment of background concentrations migrating onto the Hamilton Sundstrand facility should be considered for GMZ compliance and review of the effectiveness of the GMZ. Background concentrations shall be established in accordance with Ill. Adm. Code Parts 724 and 725 procedures. Variation from these procedures will require approval from the Illinois EPA, with the approved change incorporated into the GMZ document.

Establishment of background conditions do not necessarily need to be determined at outset of corrective action. However, background will need to be established within a timely manner.

5. The GMZ shall be a three-dimensional which shall include the entire property boundary. Description of the GMZ shall be in a document pursuant to 620.250(a)(1). GMZ data shall include a description of the 3D area, scaled maps, geologic cross sections and with a complete list of constituents present in soil and in groundwater.
6. The GMZ shall also include a Point of Compliance that meets the requirements of Ill. Adm. Code 724.195. The point of compliance shall include all waste units that are contained within the regulated area. Potential waste units include old abandoned UST locations where contaminated soil may exist, old plating area, old drum wash area, and current units still in operation which could potentially become sources of contamination. Should units in operation require RCRA closure at some point, this information may become part of the GMZ document.
7. The outside storage area should be specifically identified on Figures 1.2, 1.3, and 1.5.
8. In Section 2.1(f) page 2-2 should be identified on the appropriate Figures.

9. In Section 2.2 entitled Release Information, there is a 2.2.2 but doesn't appear to be a 2.1.
10. Section 2.2 pages 2-7 and 2-8 (e) mentions nine proposed groundwater monitoring wells with (GMZ-1 through GMZ-4 on the down-gradient side). The other 5 wells should be mentioned in this paragraph. Again Section 2.5 references 11 ground-water monitoring network wells but not all of the wells are listed or shown on Figure 2.5. This discrepancy will need to be resolved before the final GMZ document is submitted. If some of the wells are yet to be determined and installed at a date yet to be determined then potential locations may need to be shown as well intended depths and vertical coverage. If each well location is a multiple well nest in the count then letters a through c could be utilized.
12. The final GMZ document section describing soil impacts should provide more information regarding the extent of source contamination. Known soil sources of contamination need more description in the document for plume delineation purposes. This should include the loading dock, areas of JP 4 soil contamination, known UST sources, and the OSA. Soil vapor extraction (SVE) wells need to be placed in areas of known contamination for maximum effect. This information is needed to evaluate SVE well placement.
13. Illinois EPA's comment no. 6 referring to the potential of unknown sources from former units and formerly abandoned UST's may require adjustments to the GMZ document as understanding of new discovered soil sources become clear.
14. The document should include some information regarding groundwater contamination scenario's for an evaluation of the effectiveness of the technical approach proposed and final approval of the corrective action. This description should also include information of dense non-aqueous phase liquids (DNAPL) since it is still believed that these are the sources of contamination as described in the ROD.
15. The GMZ document should include concentration contour maps of contaminants. These maps as constructed overtime when submitted will help show how effective the GMZ will be. Formal delineation of the whole and separate groundwater plumes will also be necessary as part of the GMZ process.
16. The ROD groundwater remedy and source control remedies are based upon actual source removal and or direct remedial action of the sources. Currently the proposed remedy as designed is acting more as an interceptor, opposed to direct source removal. Therefore, this could decrease the effectiveness of the Remedial Action increasing the time frame to achieve Remedial Objectives.
17. The application of the HRC-X compound may require actual injection wells as opposed to using monitoring wells for application. In addition, the possibility

exists that a single application of IIRC-X may be insufficient to achieve the proposed purpose.

18. Illinois EPA still has concerns about the western edge of the property (9th street) as it relates to the overall Remedial action process. Detections in groundwater of VOCs at SMW4 and SMW8 exceed the Class I groundwater standard. The western boundary of the point of compliance of the GMZ will be 9th street. Therefore, a solution may become necessary for compliance with the ROD ARARs and Illinois Part 620.250 GMZ requirements.

If you have any questions, please feel free to contact me at the telephone number 815-223-1714 or Terry Ayers at 217-524-3300.

Sincerely,



Thomas C. Williams LPG.

cc: Bureau of Land File
Terry Ayers
Paul Jagiello DLC. DesPlaines Regional Office
Beth Wallace Illinois Attorney Generals Office
Russ Hart SR6J US. EPA Region V Chicago
Joyce Gibbons Rockford Regional Office

John Grabs
Camp Dresser & McKee
125 So. Wacker Drive Suite 600
Chicago, IL 60606